years. That the first order herein was made in 1912, a similar order in 1913, and that this proceeding to accomplish and secure the specific performance of such orders was begun in September, 1913.

That by reason of the unavoidable delays so far, said cause having been pending in the United States Circuit Court of Appeals for the Eighth Circuit since March, 1914, another year has intervened for which a similar tax should have, but has not, been levied.

That if this cause shall take its ordinary course, yet another year may intervene during which such special tax should be levied.

That the questions involved being the jurisdiction and power of the United States courts to enforce contract rights to funds to be raised by taxation by municipal corporations, when the agents of the municipal corporations refuse to obey the lawful orders of the United States courts, is a question of general and public interest, by reason of the fact that the credit of municipalities may be, and is, much affected by the doubts as to the power of the United States courts to enforce the legal obligations of said municipalities; that the rates of interest at which the securities of municipal corporations may be placed may be, and is, affected by doubts as to the power of said courts to enforce such contract obligations; that a higher rate of interest is required, by reason of such doubts, for all municipal securities, and a higher rate of taxation required to pay such higher rates of interest, and thereby is imposed upon all municipal corporations and the taxpayers therein—even of such municipalities and the taxpayers thereof which recognize to the fullest their legal obligations and which have the highest re-

gard for their credit—an increased and unwarranted burden.

That the facts are admitted; that counsel are, on both sides, fully prepared, by reason of having presented their argument heretofore to the Honorable Judges of the Eighth Circuit Court of Appeals, to present this cause fully, without requiring the usual time for preparation of new briefs.

That by reason of the peculiar circumstances above detailed, petitioner moves the Court to advance this cause to such early hearing as may be convenient to this Honorable Court.

HARRY J. CANTWELL,
Counsel for Petitioner.